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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

PATRICK CANNON,  
Plaintiff,  
v.  
NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,  
Defendant. )  
Case No. 2:18-cv-00470-KJD-CWH  
)  
)  
)  
**JOINT STIPULATION FOR EXTENSION OF**  
**TIME AND [PROPOSED ORDER]**  
)  
**(FIRST REQUEST)**  
)  
)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from November 8, 2018 to December 8, 2018. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel was out of the office for nearly three weeks on intermittent sick leave for the flu/acute pneumonia. Counsel also had a migraine for the last two days which impairs her vision. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until late-December. In addition, Counsel has active civil rights and representative misconduct matters that require immediate investigation. Counsel also has a Ninth

1 Circuit brief due in mid-November, which requires multiple levels of review. Due to Counsel's  
2 unexpected leave and heavy workload, Counsel needs additional time to adequately review the  
3 transcript and properly respond to Plaintiff's Motion for Remand. Defendant makes this request in  
4 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the  
5 Court's Scheduling Order shall be modified accordingly.  
6

7 Respectfully submitted,

8 Dated: November 7, 2018

/s/ \*Cyrus Safa

(\*as authorized by email on November 6, 2018)  
9 CYRUS SAFA  
10 Attorney for Plaintiff

11 Dated: November 7, 2018

12 DAYLE ELIESON  
13 United States Attorney  
14 DEBORAH LEE STACHEL  
15 Regional Chief Counsel, Region IX  
16 Social Security Administration

17 By

/s/ Tina L. Naicker  
18 TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

19 **ORDER**

20 APPROVED AND SO ORDERED:

21  
22  
23 DATED: November 13, 2018

24   
25 HON. CARL V. HOFFMAN  
26 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I, TINA L. NAICKER, certify that the following individual was served with a copy of the  
**JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED ORDER]** on the date  
and via the method of service identified below:

## **CM/ECF:**

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Attorneys for Plaintiff

Respectfully submitted this 7th day of November 2018,

/s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant United States Attorney